<center>REMARKS</center>

This Amendment is responsive to the Office Action dated January 28, 2008.   All rejections and objections of the Examiner are respectfully traversed. Reconsideration and further examination are respectfully requested.

Applicants wish to thank Examiner Shih for his helpfulness in a telephone interview on July 24, 2008.   The Examiner indicated that subject to further consideration and search, the amendments herein appear to overcome the currently cited references.

The amendments herein are intended to clarify and more precisely claim the present invention.   The amendments to the claims herein are supported at various places in the Specification as originally filed.   For example, the <img> command 100 in Fig. 3 is a single command processed to generate one of the buttons in the modal dialog box shown in Fig. 1.

No new matter has been added.

Claim 1 stands rejected for obviousness under 35 U.S.C. 103 based on the combination of "Using JavaScript to Create a Powerful GUI" of Hourihan ("Hourihan"), W3C 4.01 Specification ("W3C"), and "Creating a Modal Dialog Box" of Shiran ("Shiran").   Applicants respectfully traverse this rejection.

As noted previously, Hourihan discloses an HTML code segment that creates a button using an <img> tag.   The <img> button of the Hourihan article is mouse-operable only, and Hourihan includes no hint or suggestion of even the desirability of providing keypress operability of the button in the Hourihan HTML example.   W3C discloses that the tabindex attribute was available for form HTML elements, listed on page 19 as the A, AREA, BUTTON, INPUT, OBJECT, SELECT, and TEXTAREA elements.   W3C further discloses that the "enter" key may

be used to activate a selected one of those listed HTML elements. Shiran discloses that Internet

Explorer allows the creation of modal dialog boxes.

Nowhere in the combination of Hourihan, W3C and Shiran is there disclosed or

suggested any method for creating an accessible graphical image within a modal dialog box

graphical object, comprising:

> providing said modal dialog box graphical object;
> providing said accessible graphical image within said modal dialog box graphical object, wherein said providing said at least one accessible graphical image includes *completely generating said accessible graphical image responsive to processing a single markup language command, wherein said single markup language command is an image command, said image command including*
>> *a first attribute determining the processing of at least one predetermined keyboard event,* wherein said first attribute is an event handler attribute that invokes a keyboard event event handler, wherein said keyboard event handler operates to compare a keyboard event object value indicating which key was pressed with a predetermined value indicating that a predetermined key other than the enter key was pressed, and, in the event that said event object value matches said predetermined value, invoking a software routine operable to perform a predetermined function associated with said accessible graphical image, and preventing further processing of the keyboard event,
>> *a second attribute determining the processing of mouse click events,* wherein said second attribute is an event handler attribute that invokes said software routine operable to perform said predetermined function associated with said accessible graphical image, *wherein said first attribute and said second attribute both pass the same parameter to said software routine operable to perform said predetermined function associated with said accessible graphical image, such that said software routine operable to perform said predetermined function associated with said accessible graphical image operates the same in response to a user pressing said predetermined key other than the enter key and in response to said user performing a mouse click,*
>> *a third attribute having a parameter indicating an ordinal value to be associated with said accessible graphical image, wherein said ordinal value represents a relative position within an ordering of graphical images within said modal dialog box graphical object,* whereby a user is allowed to access said accessible graphical image by using a keyboard action resulting in ones of said graphical images within said modal dialog box being sequentially accessed responsive to said ordering of graphical images within said modal dialog box . . . (emphasis added)

as in the present independent claim 1. In contrast, the <img> commands under "Putting it All Together With HTML" shown on pages 4 and 5 of Hourihan include only attributes for mouse events (including "onclick"), position (e.g. "width", etc.), and the "alt" attribute, while section 17.5 of W3C describes a "button" element that itself may include an <img> element, and Shiran discloses a button for creating a modal dialog box. Accordingly, nothing in the combination of Hourihan, W3C and Shiran discloses or suggests completely generating a accessible graphical image responsive to processing a *single* markup language command, wherein the single markup language command is *an image command* including a first attribute determining the processing of at least one predetermined keyboard event, wherein the first attribute is an event handler attribute that invokes a keyboard event event handler, a second attribute determining the processing of mouse click events, wherein the second attribute is an event handler attribute that invokes the software routine operable to perform the predetermined function associated with the accessible graphical image, wherein the first attribute and the second attribute both pass the same parameter to the software routine operable to perform a predetermined function associated with the accessible graphical image, such that the software routine operable to perform said predetermined function associated with said accessible graphical image operates the same in response to a user pressing the predetermined key other than the enter key and in response to the user performing a mouse click, and a third attribute having a parameter indicating an ordinal value to be associated with the accessible graphical image, wherein the ordinal value represents a relative position within an ordering of graphical images within the modal dialog box graphical object, as in the present independent claim 1.

For the above reasons, Applicants respectfully urge that the combination of Hourihan, W3C and Shiran does not disclose or suggest all the features of the present independent claim 1.

The combination of Hourihan, W3C and Shiran therefore does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the present independent claim 1. As to the dependent claims, they each depend from independent claim 1, and are respectfully believed to be patentable over the combination of Hourihan, W3C and Shiran for at least the same reasons.

Reconsideration of all pending claims is respectfully requested.

Applicants have cancelled and amended claims, but are not conceding in this application that the unamended or cancelled claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of allowable subject matter. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Applicants' Attorney at the number listed below so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

　July 25, 2008　　　 　　/David Dagg/　　　　　　
Date   David Dagg, Reg. No. 37,809
                                         Attorney/Agent for Applicant(s)
                                         44 Chapin Road
                                         Newton, MA 02459
                                         (617) 630-1131

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